



**BIG PINE PAIUTE TRIBE OF THE OWENS VALLEY**

*Big Pine Paiute Indian Reservation*

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October 10, 2013

Mr. Keith Wallace

*Submitted via email*

Dear Mr. Keith Wallace:

The Big Pine Paiute Tribe of the Owens Valley (BPPT) would like to submit the following comments on the draft funding recommendations for Round 2 Proposition 84 Implementation Grant based on California Department of Water Resource's (DWR) evaluation of the proposals. BPPT is a proponent for Project 2 in the Inyo County Water Department's (ICWD) proposal within the Lahontan Funding Area.

**Specific Comments Regarding the Evaluation of ICWD's Proposal**

In DWR's Evaluation Summary of the Workplan it states that, "the work plan describes most of the projects and their tasks in detail. However, the work plan appears to be missing a project as expressed in the summary description of the proposal. Project 1, Inyo County and Program Office Administration, is missing from the work plan." BPPT agrees that Project 1 was not described in the workplan along with the other projects in the proposal. Project 1 was to fund the fiscal agent to administer the grant funds associated with the projects described in the proposal. Since Project 1 was administrative support for the other projects described in the proposal, it was not described in detail.

DWR's Evaluation Summary of the Workplan also states that, "Project 2 is described as stand-alone, but the application states unless a separate water main improvement project (not part of this proposal) is completed, the hydrant project will be much less effective (Att.3, pages 17 and 22)". As stated in the workplan, Project 2 is a stand-alone project. There is sufficient evidence in the workplan and throughout the proposal to share the benefits of Project 2 as a stand-alone project. The inclusion of details for the water main improvement project was to display a comprehensive approach to providing fire protection to the community of Big Pine. The reason that the water main improvement project was not bundled together with Project 2 is because of timing. As stated in the workplan (Att.3, page 22), "The anticipated project start date is October 1, 2013, which will approximately coincide with the **completion of the mainline project...**" (emphasis added). BPPT has a desire to complete projects as funding is available to strengthen its community so tying the two projects together would create a delay to the completion of the water main improvement project.

DWR's Evaluation Summary of the Budget states that, "Three out of the five projects in the budget do not have adequate supporting information. For example, projects 2 and 4 do not include labor rates to support the costs listed in the budget table." The summary shares that no labor rates were included in the budget table; however, in the budget table supplied by DWR it was not indicated that labor rates should be included in the table. In the narrative section of the budget for Project 2 (Att.4, pages 7-9) the hourly wages are defined for each budget category listed in the budget table.

#### **General Comments Regarding DWR's Evaluation of Proposals**

In the Santa Ana Funding Area, the Santa Ana Watershed Project Authority (SAWPA) received a score of 42 and the draft recommendation is to award the proposal \$8,333,500. Twelve proposals, including ICWDs, had higher scores than the SAWPA and yet are not recommended for any funding. The DWR evaluation for the SAWPA proposal showed many weaknesses with the proposal in all the evaluation categories. Based on the evaluation, there was no compelling evidence presented by DWR that the SAWPA proposal should be awarded funds. In addition, only 4 out of 22 other proposals have been recommended for funding at the same level or higher. There needs to be strong justification from DWR for awarding the SAWPA at the recommended funding level.

In reviewing evaluations for various regions throughout the State of California, it is apparent that the reviewers were consistent in commenting that proposals were "not supported by thorough documentation or sufficient rationale". Since this comment is consistent between proposals whether the overall scores were strong or weak, there seems to be a disconnect between the PSP developed to assist organizations in preparing appropriate proposals and the reviewers which may not be using the requirements shared in the Proposal Solicitation Package as the measuring tool to evaluate proposals.

As a result of the comments presented by BPPT, BPPT requests that DWR reevaluate for the ICWD proposal score and justify the recommended funding of the SAWPA proposal. Thank you for the opportunity to comment on the Round 2 Proposition 84 Implementation Grant funding draft recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Bacock", with a stylized flourish at the end.

Alan Bacock  
Water Program Coordinator